

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
MITCHELL H. KOSSOFF, : Case No. 14 Civ. 1144 (RWS)
: :
: Plaintiff, :
-against- :
: :
RICKEY FELBERBAUM and FLORIDA :
FORECLOSURE ATTORNEYS, PLLC, :
: :
: Defendants. :
-----x

DEFENDANTS' NOTICE OF MOTIONS IN LIMINE

PLEASE TAKE NOTICE that upon the annexed declaration of Eric R. Levine, dated October 14, 2016, and the exhibits thereto, and the accompanying memoranda of law, each dated October 14, 2016, and upon all other papers and proceedings in this matter, defendant Ricky Felberbaum and defendant-counterclaim plaintiff Florida Foreclosure Attorneys, PLLC will move this Court before the Honorable Robert W. Sweet, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for orders precluding plaintiff Mitchell Kossoff and his attorneys from mentioning or offering testimony or other evidence at trial concerning the topics as set forth as follows:

Motion in Limine No. 1: Motion *in Limine* to preclude the Report and all testimony of plaintiff's proposed expert witness, Ronald Quintero.

Motion in Limine No. 2: Motion *in Limine* to preclude the testimony of Susan Ulseth;

Motion in Limine No. 3: Motion *in Limine* to preclude evidence that Kossoff owes less than \$500,000 under the Note;

Motion in Limine No. 4: Motion *in Limine* concerning plaintiff's proposed Exhibits 1 through 8 and 11 through 19.

PLEASE TAKE FURTHER NOTICE that, pursuant to the parties' agreement, opposition papers shall be filed on or before October 21, 2016.

Dated: New York, New York
October 14, 2016

EISEMAN LEVINE LEHRHAUPT
& KAKOYIANNIS, P.C.

/s/ Eric R. Levine

Eric R. Levine
(elevine@eisemanlevine.com)
Eric Aschkenasy
(easchkenasy@eisemanlevine.com)

805 Third Avenue, 10th Floor
New York, New York 10022
(212) 752-1000
Attorneys for Defendants

TO: Howard Essner, Esq.
ESSNER & KOBIN, LLP
50 Broadway, 27th floor
New York, NY 10004
212-750-4949
Attorneys for Plaintiff